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July 16, 2019

Ms. Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 Twelfth Street, NW Washington, D.C., 20554

Re: WC Docket No. 19-44, Petition for Declaratory Ruling in Response to Primary

Jurisdiction Referral, Autauga County Emergency Management Communication District et al. v. BellSouth Telecommunications, LLC, No. 2:15-cv-00765-SGC

(N.D. Ala.)

Dear Secretary Dortch:

The 911 Districts for Autauga County, Calhoun County, Mobile County, and the City of Birmingham in Alabama (the "Districts") had planned to make an extensive *ex parte* submission last Friday, addressing various questions raised by the Commission staff and arguments made by BellSouth and other telecom commenters. Just before making their submission, the Districts received a copy of the *ex parte* filing by AT&T, CenturyLink, and Verizon on July 11, 2019. For the Commission's convenience, the Districts will make a single submission that also addresses the issues raised in AT&T *et al.*'s July 11 filing. The Districts will submit their paper no later than early next week.

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